

REMARKS

Claims 1- 42 are pending in the Application.

Claims 1-42 stand rejected.

I. EXAMINER INTERVIEW SUMMARY

The Applicants and Applicants' attorney appreciate the opportunity to discuss the Office Action with Examiner Collins on November 6, 2003. Examiner Collins expressed his concern with the breadth of terms like "data structure" as recited in the claims. The Applicants have addressed hereinbelow the distinctions between the claimed inventions and the applied reference. The Applicants and Applicants' attorney thank Examiner Collins for his efforts in examining the application.

II. REJECTION UNDER 35 U.S.C. § 112, SECOND PARAGRAPH

Claims 2 and 3 have been rejected under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out that which the Applicant regards as the invention. The Examiner asserts that there is insufficient antecedent basis for the terms "the plurality of attributes" appearing therein. Claims 2 and 3 have been rewritten accordingly. The Applicant respectfully requests that the rejection of claims 2 and 3 under 35 U.S.C. § 112, second paragraph be withdrawn.

III. REJECTION UNDER 35 U.S.C. § 102

Claims 1-42 have been rejected under 35 U.S.C. § 102 as being anticipated by NETSCAPE COMMUNICATION CORPORATION, "Planning and Deploying a Single Sign-On Solution," (hereinafter, "*Netscape SSO*"). The applicant respectfully traverses the rejection of claims 1-42 under 35 U.S.C. § 102.

Claim 1 is directed to a method for global sign-on (GSO) including receiving a

user login, determining an existence of a first directory entry corresponding to the user in response to a first Lightweight Directory Access Protocol (LDAP) message, and logging the user into one or more data processing services in response to one or more corresponding second directory entries, and wherein each of the first and second directory entries represents a data structure in accordance with a corresponding first and second predetermined LDAP schema object. The Examiner asserts that *Netscape SSO* teaches all of the limitations of claim 1 including logging the user into one or more data processing services in response to one or more corresponding second directory entries in disclosing strong authentication. (Paper No. 3, page 3) (citing *Netscape SSO*, pages 5-6).

This is incorrect. The teaching with respect to strong authentication discloses connecting, via a SSL connection, to a server for evaluating ACLs (Access Control Lists) using a certificate rather than a password to authenticate the user in which a certificate is maintained in an LDAP entry for the user. (*Netscape SSO*, pages 3-6). These teachings further describe authentication of a client using a certificate rather than multiple passwords using a database of private keys on a client to generate a user certificate and digital signature to a server that uses the certificate and digital signature to authenticate the user's identity; the server then checks that the user's directory entry contains the same certificate presented to the server. If successful, the server uses its ACLs to grant access to a requested resource. (*Netscape SSO*, pages 3-6.) The express teaching of *Netscape SSO* directly contradicts the Examiner's allegation. The ACLs are not LDAP directory entries, but belong to the SuiteSpot server. (*Netscape SSO*, page 5, and Figure 3.) Additionally, the Examiner asserts that *Netscape SSO* teaches that the first and second directory entries represents a data structure in accordance with a corresponding first and second predetermined LDAP schema object in disclosing LDAP tree hierarchy and entry attributes, and mapping DNs to an LDAP entry. (Paper No. 3, page 3) (citing *Netscape SSO*, pages 8 and 15-16). This is also incorrect. With respect to the LDAP tree hierarchy and entry attributes, *Netscape SSO* teaches that data in an LDAP directory is arranged in a directory tree and that it is important to consider the long-term implications of the tree structure. (*Netscape SSO*, page 8.) *Netscape SSO* further teaches that it is important to

important to think about the kinds of information the directory will contain; this decision affects both the tree hierarchy and the attributes of each entry, and, for example, entries for people require different treatment than entries for servers or other devices. (*Netscape SSO*, page 8.) The plain terms of the teaching are seen to contain no reference to first and second directory entries represents a data structure in accordance with a corresponding first and second predetermined LDAP schema object. With respect to the teaching in *Netscape SSO* respecting mapping DNs to an LDAP entry, the reference teaches the use of a client certificate to map to an LDAP entry, and matching the client certificate with a certificate from a matching entry (if any). (*Netscape SSO*, page 15.) The teaching relied upon further discloses the use of ACLs in the SuiteSpot server to determine access to a requested resource. (*Netscape SSO*, pages 15-16.) Again, the express teaching of the reference contradicts the Examiner's allegations. Anticipation requires that a single prior art reference teach the identical invention as in the claim. MPEP § 2131. Because *Netscape SSO* does not teach the identical invention of claim 1, *Netscape SSO* does not anticipate claim 1. Therefore, claim 1 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 2 is directed to the method of claim 1 wherein each of the corresponding second predetermined LDAP schema objects has one or more predetermined attributes, each of the one or more attributes having a set of one or more values, and wherein a first one of the one or more attributes is operable for initiating a corresponding one of the data processing services. Claim 2 has been rejected on the same teaching in *Netscape SSO* relied upon in rejecting claim 1. (Paper No 3, page 3.) Again, the express teaching of the reference incontrovertibly teaches the use of ACLs in the SuiteSpot server to determine access to resources. (See e.g. *Netscape SSO*, pages 15-16.) Moreover, it is incontrovertible that the reference teaches that SuiteSpot server is distinct from the directory server. (See e.g. *Netscape SSO*, Figure 3.) Plainly, the Examiner has not identified teaching in *Netscape SSO* disclosing the limitations of claim 2. Because *Netscape SSO* does not teach the identical invention of claim 2, *Netscape SSO* does not anticipate claim 2. Therefore, claim 2 is allowable under 35 U.S.C. § 102 over *Netscape*

SSO.

Claim 3 recites the method of claim 2 wherein the step of logging the user into one or more data processing systems is in response to first one of the one or more attributes having a first predetermined data value. Claim 3 has also been rejected on teaching in *Netscape SSO* disclosing that the SuiteServer maps the user's identity to a unique entry in the LDAP directory and checks that the entry contains the same certificate that was presented to the server, and that if the LDAP lookup is successful, SuiteServer continues evaluating its ACLs to determine whether the identified user is permitted to access the requested resource. (Paper No. 3, page 3) (citing *Netscape SSO*, ¶¶ 5,6 pages 5-6). Again the plain teaching of the reference is not seen to disclose the limitations of claim 3. Because *Netscape SSO* does not teach the identical invention of claim 3, *Netscape SSO* does not anticipate claim 3. Therefore, claim 3 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 4 is directed to the method of claim 1 wherein the step of logging the user into the one or more data processing services includes, for each data processing service, reading a user identifier (UID) and a password from a corresponding one of the second directory entries, and logging in the user using the UID and the password. Claim 4 has been rejected on the ground that *Netscape SSO* teaches the limitations of claim 4 in disclosing strong authentication. (Paper No. 3, page 4) (citing *Netscape SSO*, pages 3-6). The Applicant has discussed the teaching relied upon in addressing the rejection of claim 1. The aforementioned teaching discloses connecting, via a SSL connection, to a server for evaluating ACLs (Access Control Lists) using a certificate rather than a password to authenticate the user in which a certificate is maintained in an LDAP entry for the user. (*Netscape SSO*, pages 3-6). These teachings further describe authentication of a client using a certificate rather than multiple passwords using a database of private keys on a client to generate a user certificate and digital signature to a server that uses the certificate and digital signature to authenticate the user's identity; the server then checks that the user's directory entry contains the same certificate presented to the server. If successful, the server uses its ACLs to grant access to a requested resource. (*Netscape SSO*, pages

3-6.) By the plain terms of the teaching, there is nothing identified therein that discloses the limitation of claim 4. Additionally, the Examiner is respectfully reminded that when a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. 37 C.F.R. § 1.104(c)(2). Because *Netscape SSO* does not teach the identical invention of claim 4, *Netscape SSO* does not anticipate claim 4. Therefore, claim 4 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 5 recites the method of claim 1 and further including the step of starting the one or more data processing services in response to one or more third directory entries, each of the third directory entries representing a data structure in accordance with a corresponding third predetermined LDAP schema object. Claim 5 has been rejected on the same teaching in *Netscape SSO* with respect to client authentication and single sign-on relied upon in rejecting claim 4. (See Paper No. 3, page 4.) The Examiner further relies on the same teaching with respect to the LDAP tree hierarchy and Mapping DN's relied upon in rejecting, *inter alia*, claim 1. (See Paper No. 3, pages 3-4.) The Examiner further states, without a scintilla of support that "initiating" is the same as "starting." (Paper No. 3, page 4.) Such a statement out of context is meaningless -- claim 5 does not recite "starting" without more. This is evidenced by the fact that a search on an electronic version of *Netscape SSO* returns no instance of "initiating" and the only instance of "starting" is in the context of verifying certificate chains. (See *Netscape SSO*, page 12.) The teachings relied upon have been addressed hereinabove in conjunction with, at least, claims 1 and 4. These teaching, by the plain terms thereof, are not seen to teach the limitations of claim 5. Because *Netscape SSO* does not teach the identical invention of claim 5, *Netscape SSO* does not anticipate claim 5. Therefore, claim 5 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 6 is directed to the method of claim 5 and further including the step of invoking an initialization routine corresponding to each of the data processing services, wherein each of the corresponding third predetermined LDAP schema objects includes a set of one or more attributes, and wherein the initialization routine is determined in

response to a value of a first attribute of the set of one or more attributes. Claim 6 has been rejected on the same assertions as made with respect to claim 5. (See Paper No. 3, page 4.) Again, the plain terms of the teaching are not seen to contain the limitations of claim 6 whatsoever. The Examiner has identified nothing in *Netscape SSO* disclosing, for example, invoking an initialization routine, much less an initialization routine as recited in claim 6. Because *Netscape SSO* does not teach the identical invention of claim 6, *Netscape SSO* does not anticipate claim 6. Therefore, claim 6 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 7 is directed to the method of claim 1 wherein the step of logging the user into one or more data processing services includes the step of determining if a first one of the data processing services requires a prerequisite service. Claim 7 has been rejected on the same teaching in *Netscape SSO* relied upon in rejecting, *inter alia*, claim 4. (Paper No. 3, pages 4-5.) The Examiner also relies on inherency, asserting that "inherently every task or service that is required to perform prior to the desired task or service must execute before the desired task or service." (Paper No. 3, page 5.) The teachings in *Netscape SSO* relied upon have previously been addressed. By the plain terms thereof, these teachings are not seen to disclose the limitations of claim 7. With respect to the Examiner's reliance on inherency, this reliance is misplaced for several reasons. The allegedly inherent characteristic does not address the limitation of claim 7. Claim 7 does not recite executing a task or service that is required to perform prior to the desired task or service. Additionally, inherency is not determined on the basis of unsupported Examiner allegations. The Examiner must provide evidence that the allegedly inherent characteristic is necessarily present in the thing disclosed, and would be recognized as such by one of ordinary skill on the art. MPEP § 2112. For at least these reasons, the Examiner has not shown that *Netscape SSO* teaches the identical invention of claim 7. Therefore, *Netscape SSO* does not anticipate claim 7 and claim 6 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 8 recited the method of claim 7 in which each of the corresponding second predetermined LDAP schema objects has one or more predetermined attributes, each of

the one or more attributes having a set of one or more values, and wherein determining if the first one of the data processing services requires a prerequisite service is in response to a preselected value of a first one of the one or more attributes. Claim 8 has been rejected on the same teaching in *Netscape SSO* relied upon in rejecting, *inter alia*, claim 5 and the inherency asserted with respect to claim 7. (See Paper No. 3, page 5.) As previously discussed, the Examiner's reliance on inherency is misplaced, and the by the plain terms of the teachings, are not seen to teach the limitations of claim 8. The Examiner is respectfully reminded that when a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable... 37 C.F.R. § 1.104(c)(2). Because *Netscape SSO* does not teach the identical invention of claim 8, *Netscape SSO* does not anticipate claim 8. Therefore, claim 8 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 9 recites the method of claim 1 wherein the step of logging said user into one or more data processing services includes the step of determining if a first one of said data processing services takes an identifier value. Claim 9 has been rejected on teaching in *Netscape SSO* disclosing a server authorizes access by evaluating ACLs. (Paper No 3, page 5) (citing *Netscape SSO*, Figure 2, step 4 and Figure 3, step 6). Plainly, a teaching of evaluating ACLs does not teach determining if a first one of the data processing services takes an identifier value as recited in claim 9. Because *Netscape SSO* does not teach the identical invention of claim 9, *Netscape SSO* does not anticipate claim 9. Therefore, claim 9 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 10 recites the method of claim 9 wherein determining if a first one of said data processing services takes an identifier value is in response to a fourth directory entry, said fourth directory entry representing a data structure in accordance with a corresponding fourth predetermined LDAP schema object. Claim 10 has been rejected on the same assertions made with respect to claim 9 and the teachings relied upon in rejecting, *inter alia*, claim 5. (See Paper No. 3, page 5.) All of these assertions have been previously addressed and by the plain terms of the disclosure in *Netscape SSO*, the Examiner has failed to identify teachings in the reference that disclose the identical

invention of claim 10. Because *Netscape SSO* does not teach the identical invention of claim 10, *Netscape SSO* does not anticipate claim 10. Therefore, claim 10 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 11 recites the method of claim 10 wherein the fourth predetermined LDAP schema object has one or more predetermined attributes, each of the one or more attributes having a set of one or more values, and wherein determining if the first one of said data processing services takes an identifier value is in response to a preselected value of a first one of said one or more attributes. Claim 11 has been on the same teaching in *Netscape SSO* relied upon in rejecting claim 10. (See Paper No. 3, pages 5-6.) All of these assertions have been previously addressed and by the plain terms of the disclosure in *Netscape SSO*, the Examiner has failed to identify teachings in the reference that disclose the identical invention of claim 11. Because *Netscape SSO* does not teach the identical invention of claim 11, *Netscape SSO* does not anticipate claim 11. Therefore, claim 11 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claim 12 is directed to the method of claim 11 and further including invoking an initialization routine corresponding to said first data processing service in response to an attribute value in a third directory entry corresponding to said first data processing service, said third directory entry representing a data structure in accordance with a corresponding third predetermined LDAP schema object, said initialization routine being determined in response to said attribute value, and wherein said identifier value is passed to said initialization routine. Claim 12 has been rejected on the same teaching in *Netscape SSO* as relied upon in rejecting, *inter alia*, claim 11. All of these assertions have been previously addressed. Referring to the plain terms of the disclosure in *Netscape SSO*, the Examiner has failed to identify teachings in the reference that disclose the identical invention of claim 12. Because *Netscape SSO* does not teach the identical invention of claim 12, *Netscape SSO* does not anticipate claim 12. Therefore, claim 12 is allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claims 13 and claim 14 recite the method of claim 9 in which, respectively, the identifier value is a required identifier value and the identifier value is an optional identifier

value. The Examiner has rejected claims 13 and 14 on Figures 2 and 3 of *Netscape SSO*, particularly steps 4 and 6, respectively. (Paper No. 3, page 6.) The disclosure in *Netscape SSO* with respect to these teachings have been addressed in conjunction with claim 9. This teaching discloses a server authorizing access by evaluating ACLs. The Examiner further relies on inherency, asserting that every identifier value or piece of required information is inherently either required or optional. The Examiner's reliance on inherency fails for several reasons. Claims 13 and 14 do not recite a "required piece of information." It is indisputable that where an Examiner has to excise the express term from a claim and substitute the Examiner's broad language to make the rejection, a *prima facie* showing of anticipation has not been made. Similarly, neither claim 13 nor claim 14 recite an identifier value is either required or optional. Claim 13 and claim 14 are independent of each other, and the Examiner cannot Murphy them into a composite and reject that. Moreover, a showing of inherency requires that the Examiner provide evidence that the allegedly inherent characteristic is necessarily present in the thing disclosed, and would be recognized as such by one of ordinary skill on the art. MPEP § 2112. Because the Examiner has failed to identify teachings in the reference that disclose the identical invention of claims 13 and 14, *Netscape SSO* does not anticipate claim 13 and claim 14. Therefore, claim 13 and claim 14 are allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Claims 15-28 have been rejected on the same basis as claims 1-14 as not reciting limitations beyond those of claims 1-13, respectively. (Paper No. 3, page 7.) Consequently, because *Netscape SSO* does not teach all of the limitations of each of claims 1-14, necessarily the Examiner has not shown that *Netscape SSO* teaches all of the limitations of the respective ones of claims 15-28. Therefore claims 15-28 are not anticipated by *Netscape SSO* and each of claims 15-28 are allowable under 35 U.S.C. § 102 over *Netscape SSO*.

Likewise claims 29-42 have been rejected on the same basis as claims 1-14 as not reciting limitations beyond those of claims 1-13, respectively. (Paper No. 3, page 7.) Consequently, because *Netscape SSO* does not teach all of the limitations of each of

claims 1-14, necessarily the Examiner has not shown that *Netscape SSO* teaches all of the limitations of the respective ones of claims 29-42. Therefore claims 29-42 are not anticipated by *Netscape SSO* and each of claims 29-42 are allowable under 35 U.S.C. § 102 over *Netscape SSO*.

IV. CONCLUSION

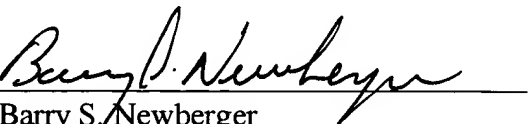
As a result of the foregoing, it is asserted by the Applicants that the remaining claims in the Application are in condition for allowance, and respectfully request an early allowance of such claims.

Applicant respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining problems.

Respectfully submitted,

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